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Attorneys for Defendant,
SUTTER HEALTH and SUTTER MEDICAL CENTER OF SANTA ROSA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and Personal Representative of THE ESTATE) OF RYAN GEORGE; VALERIE GEORGE) and TAJMAH BEAUCHAMP, as Legal) Representatives for Jaida George and Ryan) George, Jr.; VALERIE GEORGE,) Individually; DONALD GEORGE; and) TAJMAH BEAUCHAMP, Individually,)

CASE NO.: 3:08-cv-02675-EDL

**STIPULATION AND [PROPOSED]
ORDER TO FILE RESPONSIVE
PLEADING AFTER PLAINTIFFS FILE
AMENDED COMPLAINT**

Plaintiffs,
)

SONOMA COUNTY SHERIFF'S
DEPARTMENT; BILL COGBILL;)
COUNTY OF SONOMA; CALIFORNIA
FORENSIC MEDICAL GROUP, INC.;)
MICHAEL E. DAGEY, R.N.; ELIZABETH)
KAISER; JAMES LUDERS, M.D.;)
LAURA RODRIGUEZ; SUTTER)
HEALTH; SUTTER MEDICAL CENTER)
OF SANTA ROSA; and DOES 1 through)
25, inclusive,)

Defendants.)

SUBJECT TO THE APPROVAL OF THE COURT, IT IS HEREBY STIPULATED BY
AND BETWEEN THE PARTIES HERETO, THROUGH THEIR RESPECTIVE COUNSEL OF
RECORD:

1. Plaintiffs' Complaint was filed on May 28, 2008.
2. Service has been made on Sutter Medical Center of Santa Rosa, Sutter Health, Sonoma County Sheriff's Department, Bill Cogbill and County of Sonoma.
3. Counsel have met and conferred regarding the Complaint, and plaintiffs have agreed to file an Amended Complaint.
4. Responsive pleadings for defendants Sutter Medical Center of Santa Rosa, Sutter Health, Sonoma County Sheriff's Department, Bill Cogbill and County of Sonoma will not be due until 20 days after plaintiffs file and serve an Amended Complaint.

SO STIPULATED.

DATED: July 2 , 2008

LA FOLLETTE, JOHNSON, DE HAAS,
FESLER & AMES

By: _____ /s/ _____
LARRY THORNTON, ESQ.
Attorneys for Defendants SUTTER HEALTH
and SUTTER MEDICAL CENTER OF
SANTA ROSA

DATED: July 2, 2008

SPAULDING McCULLOUGH & TANSIL, LLP

By: _____ /s/
TERRY S. STERLING, ESQ.
Attorneys for Defendants SONOMA
COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF
SONOMA

DATED: July 2 , 2008

SANFORD WITTELS & HEISLER, LLP

By: _____ /s/
STEVEN WITTELS, ESQ.
Attorneys for PLAINTIFFS

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1 DATED: July ___, 2008

LAW OFFICE OF TANYA BRANNAN

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By: _____ /s/
TANYA BRANNAN, ESQ.
Attorneys for PLAINTIFFS

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PROPOSED ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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10 DATED: _____, 2008

11 _____
12 The Honorable ELIZABETH D. LAPORTE
13 UNITED STATES MAGISTRATE JUDGE

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1 Re: **GEORGE v. SUTTER MEDICAL CENTER OF SANTA ROSA, ET AL.**
 2 United States District Court Case No.: CV 08 2675 EDL

3 **PROOF OF SERVICE**

4 I am a citizen of the United States. My business address is 655 University Avenue, Suite
 5 119, Sacramento, California 95825. I am employed in the City and County of Sacramento where
 6 this service occurs. I am over the age of 18 years and not a party to the within action.

7 On July 2, 2008, following ordinary business practice, I served a true copy of the foregoing
 8 document(s) described as:

9 **STIPULATION AND [PROPOSED] ORDER TO FILE RESPONSIVE PLEADING
 10 AFTER PLAINTIFFS FILE AMENDED COMPLAINT**

11 [X] **BY ELECTRONIC FILING USING THE COURT'S ELECTRONIC FILING
 12 SYSTEM** which constitutes service of the filed document on the addressee(s) listed below:

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17 **Lead Counsel for Plaintiffs**

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22 **Counsel for Defendants**
 Sonoma County Sheriff's Dept.,
 Bill Cogbill and County of Sonoma

23 I declare under penalty of perjury under the laws of the State of California that the
 24 foregoing is true and correct.

25 Executed July 2, 2008, at Sacramento, California.

26 _____ /s/
 27 Kathryn A. DeLisle
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